

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

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|---------------------------------------|------------------------------|
| <b>RE: JUDY REBECCA CLARK, DEBTOR</b> | <b>CASE NO. 19-11314-JDW</b> |
|                                       | <b>CHAPTER 13 BK</b>         |

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**MOTION TO BORROW**

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COMES NOW, Debtor, Judy Rebecca Clark, by and through her Attorney, James W. Amos, and moves the Court to allow her to incur new debt, and would show unto the Court as follows:

1. Debtor's 2006 BMW 3251 has become inoperable and will be too costly to repair. Therefore, Debtor needs reliable transportation and wishes to purchase another vehicle. Debtor will surrender the 2006 BMW 3251 to Title Max if the Court will give her permission to purchase another vehicle.

WHEREFORE, Debtor moves the Court to allow her to incur new debt by purchasing a vehicle. The limit on the amount that may be borrowed is \$15,000.00 and the monthly payment amount will be no more than \$400.00.

Respectfully submitted,

/s/ James W. Amos  
JAMES W. AMOS MSB #1559  
ATTORNEY FOR DEBTOR  
2430 CAFFEY ST.  
HERNANDO, MS 38632  
PHONE: 662-429-7873

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day mailed by U.S. Mail, postage prepaid, and/or via ECF a true and correct copy of the above and foregoing MOTION TO BORROW to the following:

- 1) Locke D. Barkley  
Chapter 13 Trustee  
[sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)
- 2) Judy Rebecca Clark  
P.O. Box 649  
Hernando, MS 38632
- 3) U. S. Trustee  
[USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Dated this the 8<sup>th</sup> day of April, 2020.

/s/James W. Amos  
JAMES W. AMOS